

I hereby support the provisions of the NPRM in WT Docket No. 05-235 to discontinue the requirement for proficiency in Morse code for all classes of Amateur Radio licensing.

My credentials are unique and should be recognized as having considerable merit when reading my comments on NPRM in WT Docket No. 05-235. The board of directors of the American Radio Relay League has awarded to me at their meeting of July 15-16, 2005, the annual Herb S. Brier award for a volunteer as Instructor of the Year 2004. To this I will add the fact that I have continuously held an amateur radio license since 1960. I have been a member of the American Radio Relay League for the same 45 years. Since 1994, I have held the elected office of Education Director of the North Shore Radio Club, an Illinois nonprofit corporation with a membership of well over 100 residents of the Chicago, Illinois northern suburban area. As the holder of this office, I have taught as many as three classes per year and can claim to have educated several hundred persons who currently hold amateur radio licenses, in the art of radio and the practice of operating an amateur station. For the same period of time, I have served as a Volunteer Examiner in both the amateur and commercial radio licensing programs.

Additionally to an Amateur Radio license (K9RD), I have a Global Maritime Operator and Maintainer license (DBGB011052) with Shipboard Radar Endorsement, Second Class Radio Telegraph Operators License (T2GB007245), and a General Radio Operators License (PG1834841). Station licenses for General Mobile Radio Service (KAC9888) and Ship Compulsory Equipped (WCZ4319) are also issued in my name (FRN2879112). All of these licenses are active.

Having listed my credentials, I will amplify on my stated position in support of NPRM in WT Docket No. 05-235. My role as Education Director and my accomplishment as Instructor of the Year at the national level have exposed me to newcomers to the amateur radio hobby. I also encounter amateur radio operators who have held valid licenses for over a half century. The consistent issue with almost all who seek a new amateur license or an upgrade to an existing license is a widely held belief that the Morse code competency requirement is a remnant of the past. The reasons it exists and the reasons it persists as a requirement for the General and Amateur Extra classes of license is a figment of history and the long time it has taken to change Section 25 of the Rules and Regulations of the International Telecommunications Union, and for no other valid reasons.

The history of this code requirement dates back to a time when telegraphy and not telephony was the only mode of choice for adding intelligence to a radio emission. It would make sense to require knowledge of the code if this

were the only means available for communicating. What never made any sense was a requirement in the Amateur service for speeds of Morse code greater than 5 words per minute. The purpose of licensing is to minimize interference from radio emissions with other users of the radio services and guarantee a necessary and sufficient competence in the operation of the radio equipment. A test of the Morse code at 5 words per minute is a test of the Morse code alphabet, that is, the audible symbols that represent letters, numbers, punctuations, and prosigns of the natural language character set, in the case of the English language, the Latin letters and Arabic numerals. Testing of the speed at which this communication could be accomplished was never necessary in the Amateur service. An amateur radio operator could learn the Morse code and increase his ability to copy at higher speeds by simply using this mode of communications. In the commercial circuits, the speed requirement was necessary due to the requirements of the industry to certify operators that could communicate with the other professional operators in those services.

Today, it is often stated that many modes exist for communications. Some permit the human voice to modulate radio signals. Others use data communications generated and received by computing devices. While it is true that the Morse code is the only data communications form designed to be interpreted by humans without the aid of a computer, that alone does not justify making the learning and testing of Morse code competency a requirement for any grade of license in the Amateur service.

The experience I offer as a Volunteer Examiner, certified by the American Radio Relay League Volunteer Examiner Coordinator, is that from having served in this capacity in the course of over 100 examination sessions. The statistical results of these VE examination sessions is that between zero percent and five percent of the test elements administered in the past ten years have included any of the Element 1 series for Morse code. In the years since the restructuring of the Amateur Rules became effective on April 15, 2000, fewer than two percent of the elements tested in my experience as a Volunteer Examiner included Element 1 for Morse code competency at a speed of 5 words per minute.

In the classes I teach to Amateur license candidates, typically only one in any class ever sits for an Element 1 Morse code test. Usually, my classes have 15 students. The only reason the candidates give for taking the Element 1 test is to attain a General or Amateur Extra class license. None of those whom I ask states that they possess any desire to use the Morse code when their new operating privileges are conferred. What they seek is the ability to operate on allocations below 30 MHz, where long distance propagation is most available.

On February 1, 1999, the Safety of Life at Sea (SOLAS) Convention effectively terminated the remaining commercial circuits utilizing the Morse code. The United States Navy and coastal watch stations ceased monitoring of the 500 KHz International Distress Frequency, where only Morse code operation was permitted. Amateur radio is now the last vestige of Morse code operation, and it is kept alive in the Amateur service by those who enjoy using it for its advantages of bandwidth conservation and throughput during difficult operating conditions. That is the role of experimenters and others who pursue a hobby. They use it for enjoyment and adventure and practical communications at relatively slow speeds. It is by choice that they use this mode of operation. It should not be nor is it a requirement, except for Novice and Technician Plus class amateurs operating below 30 MHz where permitted. Since it is not a requirement for operation, I submit that it should no longer be a requirement for licensing.